

Exhibit A

Ives, Erik J.

From: andrew.wilson@BakerBotts.com
Sent: Thursday, May 28, 2020 9:52 AM
To: Reynolds, Steven J.; jon.swenson@bakerbotts.com; hop.guy@BakerBotts.com; karina.smith@bakerbotts.com; jpfieweger@michaelbest.com; agollwitzer@michaelbest.com
Cc: Vanderporten, Steven L.; Ives, Erik J.; Koropp, David E.
Subject: RE: Service of Sealed Filings and Proposed Motion

Steven,

Defendants intend comply with the Court's order regarding Ubiquiti's premature motion to compel. If Ubiquiti insists on prematurely filing its factually incorrect motion attached to your email prior to the court-ordered time for the parties to discuss the issues, Defendants oppose and will respond in due course.

Defendants have already provided Ubiquiti with the information that Ubiquiti requested in order to for Ubiquiti to provide a settlement demand over a year ago. Despite Defendants providing that information, Ubiquiti refused to provide a settlement demand as promised. None of the information sought to be de-designated by Ubiquiti in its motion relates to the information that Ubiquiti previously requested be provided to it in order to provide a settlement demand.

Thanks,

Andrew Wilson

T +1.202.639.1312

M +1.301.807.6646

F +1.202.508.9336

Baker Botts L.L.P.
700 K Street, NW
Washington, D.C. 20001

From: Reynolds, Steven J. <sreynolds@foxswibel.com>
Sent: Wednesday, May 27, 2020 9:00 PM
To: Wilson, Andrew <andrew.wilson@BakerBotts.com>; Swenson, Jon <jon.swenson@bakerbotts.com>; Guy, Hop <hop.guy@BakerBotts.com>; Smith, Karina <karina.smith@bakerbotts.com>; jpfieweger@michaelbest.com; agollwitzer@michaelbest.com
Cc: Vanderporten, Steven L. <svanderporten@foxswibel.com>; Ives, Erik J. <eives@foxswibel.com>; Koropp, David E. <dkoropp@foxswibel.com>
Subject: RE: Service of Sealed Filings and Proposed Motion

[EXTERNAL EMAIL]

Andrew and Jon,

Would you please let us know this evening (or by tomorrow at 10:00 am CT at the latest) what your position is on the attached motion (which I also attached in the e-mail below)? We will file it tomorrow morning and would like to inform Judge Cummings whether it is contested or not.

Thanks,

-Steve

Steve Reynolds

sreynolds@foxswibel.com | 312-224-1249 (direct) | 312-636-4674 (mobile)

FOX SWIBEL

FOX SWIBEL LEVIN & CARROLL LLP

200 W. Madison Street, Suite 3000 | Chicago, Illinois 60606

www.foxswibel.com | 312-224-1200 (main) | 312-224-1201 (fax)

Confidentiality: This transmission is for the exclusive and confidential use of the intended recipient. It may be an attorney-client communication and privileged. The unauthorized use, disclosure or copying of this transmission is strictly prohibited and may be unlawful. If you have received this transmission in error, please notify me by return mail or telephone and delete the transmission from your system. Thank you.

From: Reynolds, Steven J.

Sent: Tuesday, May 26, 2020 11:23 PM

To: 'andrew.wilson@BakerBotts.com'; jon.swenson@bakerbotts.com; hop.guy@BakerBotts.com; karina.smith@bakerbotts.com; jpfieweger@michaelbest.com; agollwitzer@michaelbest.com

Cc: Vanderporten, Steven L.; Ives, Erik J.; Koropp, David E.

Subject: Service of Sealed Filings and Proposed Motion

Counsel,

In light of Defendants' failure to respond to our continued meet/confer requests, Ubiquiti filed a motion to compel and for sanctions with respect to Defendants' overbroad designation of documents as "CONFIDENTIAL RESTRICTED – ATTORNEYS' EYES ONLY" (the "AEO Motion"). Attached are Exhibits A & B to the AEO Motion, which we filed under seal.

Given our continued inability to confer with our client regarding the content of Defendants' production and the related substance of our pre-settlement conference demand letter, Ubiquiti also intends to file a motion before Magistrate Judge Cummings to extend the deadlines for submission of the parties' pre-settlement conference letters as follows: (a) Ubiquiti's letter to be filed within 14 days after the Court's ruling on the pending AEO Motion, and (ii) Defendants' letter to be filed within 14 days after submission of Ubiquiti's letter. Attached is a copy of the motion for extension. Given the timing, please advise us as to Defendants' position on the motion for extension (agreed, no objection, or opposed) by no later than **4:00 p.m. CST tomorrow, May 27**.

Please feel free to contact us with any questions, or to discuss this matter.

-Steve

Steve Reynolds

sreynolds@foxswibel.com | 312-224-1249 (direct) | 312-636-4674 (mobile)

FOX SWIBEL

FOX SWIBEL LEVIN & CARROLL LLP

200 W. Madison Street, Suite 3000 | Chicago, Illinois 60606

www.foxswibel.com | 312-224-1200 (main) | 312-224-1201 (fax)

Confidentiality: This transmission is for the exclusive and confidential use of the intended recipient. It may be an attorney-client communication and

privileged. The unauthorized use, disclosure or copying of this transmission is strictly prohibited and may be unlawful. If you have received this transmission in error, please notify me by return mail or telephone and delete the transmission from your system. Thank you.

Confidentiality Notice:

The information contained in this email and any attachments is intended only for the recipient[s] listed above and may be privileged and confidential. Any dissemination, copying, or use of or reliance upon such information by or to anyone other than the recipient[s] listed above is prohibited. If you have received this message in error, please notify the sender immediately at the email address above and destroy any and all copies of this message.